

## **Remarks**

### **I. Introduction**

This is in response to the Office Action dated May 22, 2009.

The Office Action objected to the title of the application. In response, the title has been amended.

The Office Action rejected claims 19, 20, and 22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,148,000 to Feldman et al. (Feldman).

The Office Action rejected claim 21 under 35 U.S.C. §103(a) as being unpatentable over Feldman in view of U.S. Patent No. 6418,476

Claim 19 has been amended. No new matter has been added.

Claims 19-22 are pending.

### **II. Rejection under 35 U.S.C. §102(e)**

Independent claim 19 was rejected under 35 U.S.C. §102(e) as being anticipated by Feldman. In order for a claim to be anticipated under 35 U.S.C. §102, **each and every** limitation of the claim must be found either expressly or inherently in a single prior art reference. PIN/NIP, Inc. v. Platte Chem. Co., 304 F.3d 1235, 1243 (Fed. Cir. 2002). In the present case, Feldman does not show each and every limitation of independent claim 19. Therefore, Applicants request the withdrawal of the rejection under 35 U.S.C. §102(e).

Independent claim 19 has been amended to recite:

A method of operating a router in a communication network comprising a plurality of routers, said router having a plurality of local non-broadcast multiple access interfaces to at least one connection-oriented non-broadcast multiple access network, said method comprising the steps of:

assigning a number to each of the local non-broadcast multiple access interfaces of said router wherein each of said assigned numbers is local to said router;

grouping the local non-broadcast multiple access interfaces of said router into connectivity classes using local connectivity information;

encoding information identifying the assigned numbers and the connectivity classes into a link state packet; and

transmitting the link state packet to at least one other router in the communication network.

In independent claim 19, “a router” has “a plurality of local non-broadcast multiple access interfaces. Further in the “assigning” step and the “grouping” step, claim 19 recites “the local non-broadcast multiple access interfaces **of said router**”. Accordingly, “the local non-broadcast multiple access interfaces” are interfaces of a single router.

Feldman is directed to a scheme using standard IP routing protocols as a basis for switching IP datagrams, packets, and frames, in switching environments, such as ATM, with the addition of a virtual circuit protocol. Column 3, lines 5-10 describe that each ingress node in a network is assigned a unique VCI value. The Office Action alleges that this section of Feldman discloses “assigning a number to each of the local non-broadcast multiple access interfaces wherein each of said assigned numbers is local to said router”. However, each ingress node of Feldman is a separate router. The ingress nodes of Feldman are not multiple interfaces of a single router. There is no description in Feldman of assigning numbers to multiple local interfaces of a router. Therefore, Feldman does not disclose “assigning a number to each of the local non-broadcast multiple access interfaces of said router wherein each of said assigned numbers is local to said router,” as recited in independent claim 19.

For the reasons described above, Feldman cannot anticipate independent claim 19 under the strict anticipation standard of 35 U.S.C. §102. Therefore, independent claim 19 is allowable over the cited art. All remaining claims are dependent upon an allowable independent claim and are therefore also allowable.

III. Conclusion

For the reasons discussed above, all pending claims are allowable over the cited art. Reconsideration and allowance of all claims is respectfully requested.

Respectfully submitted,

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